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Attorney for Defendant Martin Guaglione

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTIN GUAGLIONE,

Defendant.

CASE NO. 2:24-CR-00260-RFB-BNW

**STIPULATION AND [PROPOSED ORDER] TO ALLOW DEFENDANT MARTIN
GUAGLIONE TO TRAVEL TO CALIFORNIA**

IT IS HEREBY STIPULATED by and between Martin Guaglione, Defendant, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, PLLC, and the Plaintiff, United States of America, by and through Sue Fahami Acting United States Attorney, District of Nevada, and Jacob H. Operskalski, Assistant United States Attorney, that Mr. Guaglione be permitted to travel to California on the following dates:

1. **February 3, 2025 to February 5, 2025, and**
2. **February 25, 2025, to February 27, 2025.**

Pursuant to [DKT 7], Section III(d), of the Pretrial Diversion Agreement, Defendant must seek permission in writing from the United States Attorney's Office, United States Pretrial Services and **the Court** before traveling outside the District of Nevada.

The United States Attorney's Office does not have any objection to this travel request.

United States Pretrial Service Officer Samira Barlow has been consulted and has approved this travel request.

1 The Defendant agrees to comply with all conditions of the Pretrial Diversion Agreement.

2 Dated this 29th day of January, 2025.

3 Sue Fahami
4 ACTING UNITED STATES ATTORNEY
DISTRICT OF NEVADA

CLARK HILL PLLC

5 /s/Jacob H. Operskalski
6 JACOB H. OPERSKALSKI
7 Assistant United States Attorney
Attorney for Plaintiff,
UNITED STATES OF AMERICA

/s/Paola M. Armeni
PAOLA M. ARMENI
Attorney for Defendant,
MARTIN GUAGLIONE

8
9 **ORDER**

10 Based on the foregoing stipulation and good cause appearing,

11 **IT IS HEREBY ORDERED** that Defendant, Martin Guaglione is permitted to travel to
12 California, on the following dates:

13 February 3, 2025, to February 5, 2025, and

14 February 25, 2025 to February 27, 2025.

15 **IT IS FURTHER ORDERED** that Defendant Martin Guaglione shall continue to comply
16 with all conditions of the Pretrial Diversion Agreement.

17 **IT IS SO ORDERED.**

18 **DATED** this 31st day of January, 2025.

19 

20 **UNITED STATES DISTRICT COURT JUDGE**
21 **CASE NO.: 2:24-CR-00260-RFB-BNW**